

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re:

Case No.: 17-15603(JKS)

Mark Anthony Andreottis, II  
a/k/a Mark Andreotti d/b/a  
Praetorian Investor Services,

Chapter: 7

Judge: John K. Sherwood

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**NOTICE OF PROPOSED PRIVATE SALE**

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Charles M. Forman, Chapter 7 Trustee in this case proposes to sell property of the estate to the persons and on the terms described below. If you object to the sale, you must file a written objection and serve it on the Clerk of the United States Bankruptcy Court and serve it on the party listed below not later than 7 days before the hearing date.

Address of the Clerk: United States Bankruptcy Court Martin Luther King, Jr. Federal Courthouse 50 Walnut Street, 3 <sup>rd</sup> Floor P.O. Box 1352 Newark, NJ 07102
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If an objection is filed, a hearing will be held before the Honorable John K. Sherwood on October 16, 2018 at 10:00 a.m. at the United States Bankruptcy Court, Courtroom No. 3D, United States Bankruptcy Court, 50 Walnut Street, 3<sup>rd</sup> Floor, Newark, New Jersey.

If no objection is filed, the clerk will enter a Certification of No Objection and the sale will be held as proposed.

<p><b>Description of property to be sold:</b> The Trustee seeks to sell the real property located at 811 Willow Avenue, Unit #2, Hoboken, New Jersey (the “Property”) to Kevin Murphy and Katia Montresor for \$580,000 pursuant to a Contract for Sale of Real Property. The Property is being sold free and clear of all liens, claims, interests and encumbrances pursuant to 11 U.S.C. §363(b) and (f) and the interest of Melissa Couch Andreotti, the Co-Owner of the Property pursuant to 11 U.S.C. §363(h).</p>
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<p>The property has a value of between \$599,000 and \$629,000. No real estate broker has been involved in connection with the sale of the Property. Thus, no brokers’ commissions will be required to be paid.</p>
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<p>The Trustee has performed a liquidation analysis and had determined that the offer of \$580,000 is fair and reasonable, and represents between 94% and 95% of the fair market value of the Property.</p>
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<p><b>Proposed Purchaser:</b> Kevin Murphy and Katia Montresor</p>
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<p>The Trustee and the Proposed Purchasers have entered into a Contract for Sale of Real Property. A copy of the Contract may be obtained by contacting counsel for the Trustee at the address set forth below.</p>
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<p>Any person wishing to make a higher and better offer must provide a ten (10%) percent deposit in good funds on or before October 9, 2018, must have financing in place and close on or before October 30, 2018.</p>
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**Sale Price:** \$580,000

☐ Pursuant to D.N.J. LBR 6004-5, I request to pay the real estate broker and/or real estate attorney at closing on the terms set forth below.

Name of Professional:

Amount to be paid:

Services Rendered:

Higher and better offers will be received. They must be in writing and filed with the clerk not later than 7 days before the final hearing date set forth above.

Objections must be served on, and requests for additional information directed to:

Name: Kim R. Lynch, Esq.

Address: Forman Holt, 66 Route 17 North, First Floor, Paramus, NJ 07652

Telephone No.: 201-845-1000

E-Mail: [klynch@formanlaw.com](mailto:klynch@formanlaw.com)